

Katie Carson

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

- - -

ALLSTATE FIRE AND CASUALTY  
INSURANCE COMPANY,

C.A. NO.:  
7:17-CV-00901-TMC

Plaintiff,

VS.

WYNDOLYN DUNCAN, TIMOTHY  
DUNCAN, and KATIE CARSON,  
INDIVIDUALLY, AND AS GUARDIAN  
AD LITEM FOR D.C. AND M.C.,

Defendants.

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DEPOSITION OF KATIE CARSON

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DATE TAKEN: Tuesday, August 21, 2018

TIME BEGAN: 12:00 p.m.

TIME ENDED: 12:35 p.m.

LOCATION: McAngus Goudelock & Courie, LLC  
55 East Camperdown Way, Suite 300  
Greenville, South Carolina 29601

REPORTED BY: Lisa Garson, Court Reporter  
EVERYWORD, INC.  
P.O. Box 1459  
Columbia, South Carolina 29202  
803-212-0012

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1 Q And where in Columbia did you live?  
 2 A Before we moved, we were near Cayce.  
 3 Q So across the river?  
 4 A Yeah.  
 5 Q So you actually lived in Casey?  
 6 A When we first moved to Columbia, yes, we  
 7 were right in Casey; and then just past that near  
 8 the base was our second location there.  
 9 Q Fort Jackson?  
 10 A Uh-huh.  
 11 Q So out on Garners Ferry Road?  
 12 A Yes.  
 13 Q Do you remember what subdivision out on  
 14 Garners Ferry it was?  
 15 A I remember we were on Byron Road. I  
 16 don't know that it had an official name. It was  
 17 behind the VA hospital.  
 18 Q How long did y'all live there, I guess  
 19 total, Columbia and Cayce?  
 20 A About two years.  
 21 Q And then moved from Columbia -- you went  
 22 from Cayce to Columbia?  
 23 A Right. Technically all Columbia, but.  
 24 Q I consider it all Columbia, too. And  
 25 then moved in October, and lived with your parents

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1 in Inman, correct?  
 2 A Correct.  
 3 Q And then prior to living in Columbia,  
 4 where did y'all live?  
 5 A We were in Spartanburg, South Carolina.  
 6 Q And how long did you live there?  
 7 A We were probably there about two years in  
 8 the house we were buying.  
 9 Q Prior to Spartanburg, where did you live?  
 10 A Inman, South Carolina. Right across the  
 11 street from my parents.  
 12 Q Your husband went to Mann, and what did  
 13 he do after that?  
 14 A He opened his own business in Greenville.  
 15 Q What business was that?  
 16 A It was printing, graphic design,  
 17 multimedia.  
 18 Q What was the name of it?  
 19 A Acme Imaging.  
 20 Q A-C-M-E?  
 21 A Yes, sir.  
 22 Q And how long did he do that?  
 23 A A few years, but I don't know exactly.  
 24 It was long before me.  
 25 Q And then take me through what he did, job

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1 wise, once he met you.  
 2 A When he met me, he had closed his  
 3 business; he had been going to Greenville Tech, and  
 4 was transferring to Clemson University.  
 5 Q Did y'all meet at Greenville Tech?  
 6 A No. We worked at a delivery restaurant  
 7 that was in Greenville at the time.  
 8 Q So when y'all met, he was getting ready  
 9 to go to Clemson?  
 10 A Correct. And he was a delivery driver,  
 11 part time, while he was attending college.  
 12 Q Did he ever go to Clemson?  
 13 A He did.  
 14 Q Did he graduate?  
 15 A He didn't actually graduate. He was in  
 16 his senior year but had to leave.  
 17 Q And where did he go from there?  
 18 A He began working in Greenville, several  
 19 jobs, but he worked as a graphics designer.  
 20 Q So that's mainly what he did, graphics  
 21 design?  
 22 A Yes. And then later, learned web design  
 23 and web development, which is what he did in  
 24 Columbia.  
 25 Q Who did he work for down there?

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1 A SCANA.  
 2 Q And the two years y'all were down in  
 3 Columbia, he worked the entire time for SCANA?  
 4 A Yes.  
 5 Q Why did y'all leave Columbia to come back  
 6 up here?  
 7 A He lost his job.  
 8 Q At SCANA?  
 9 A Yes.  
 10 Q So y'all came back up here, and did he go  
 11 to work up here?  
 12 A He was looking for a job.  
 13 Q So that would have been -- y'all moved  
 14 back up in October of 2015?  
 15 A Correct.  
 16 Q So he was looking for a job here, and  
 17 then apparently found one up in Montana; is that  
 18 right?  
 19 A Yes.  
 20 Q Did he work any here when y'all came  
 21 back?  
 22 A No.  
 23 Q And what was the job that he found up in  
 24 Montana?  
 25 A Web developer.

4 (Pages 10 to 13)

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1 Q What was the name of the company that he  
2 was going to work for?  
3 A It was for the State of Montana.  
4 Q As a web --  
5 A Developer.  
6 Q And had y'all rented a place up there?  
7 A No.  
8 Q Where were you gonna stay?  
9 A Just at a hotel.  
10 Q Had you already gotten a reservation at a  
11 hotel?  
12 A I think we had a tentative date  
13 reservation just for the day that we thought we'd  
14 get in.  
15 Q And what were you gonna do the day after  
16 that?  
17 A We were just planning to play it by ear  
18 and stay in a hotel.  
19 Q What division of the state government?  
20 Was there a particular division?  
21 A I don't remember.  
22 Q Who was his contact?  
23 A I don't remember that, either.  
24 Q What was his job title gonna be?  
25 A Web developer.

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1 Q That was the job title?  
2 A Yes.  
3 Q And do you know what department with the  
4 government it was?  
5 A I don't recall.  
6 Q So what was the hotel you were gonna stay  
7 in that day?  
8 A I don't remember the name.  
9 Q And when you say you're gonna play it by  
10 ear, what was the game plan? When was he starting  
11 work, when was his job starting?  
12 A I don't remember the date.  
13 Q Was it sometime in April?  
14 A I believe so, yes.  
15 Q But you don't remember a report date,  
16 necessarily?  
17 A I don't.  
18 Q All right. So he was gonna go to work.  
19 Were you gonna try to find a job?  
20 A No. I home schooled our children, so I  
21 didn't have the opportunity.  
22 Q Had they always been home schooled?  
23 A Yes.  
24 Q So they've never been to regular school?  
25 A No. My daughter, Sarah, just started,

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1 yesterday, the first day of high school.  
2 Q So he was gonna start a job sometime in  
3 April, but you're not sure exactly what date it  
4 was?  
5 A Correct.  
6 Q And you were gonna stay in a hotel that  
7 day, but you're not sure what the game plan was  
8 from there?  
9 A Correct.  
10 Q Was his new job gonna be a salaried job?  
11 A Yes.  
12 Q Where is the state government located in  
13 Montana?  
14 A Helena.  
15 Q Is that where y'all were gonna live?  
16 A That's where we were headed.  
17 Q Did y'all look at any apartments, or some  
18 houses, some neighborhoods?  
19 A No. We hadn't looked at any sort of  
20 rentals, or anything.  
21 Q Why is that?  
22 A I wasn't sure that this job was gonna pan  
23 out.  
24 Q How come? What were you thinking?  
25 A Well, we had issues prior to him going

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1 that he never signed up for selective service. It  
2 completely slipped his mind when he was 18, and he  
3 had already moved out of the house; and a  
4 requirement, through HR, with the state government  
5 was that you have to be registered with selective  
6 service; so that was an issue, and we weren't sure  
7 that they were going to allow him to stay there; so  
8 that, and my husband didn't keep a job very long.  
9 I honestly believed that at least the  
10 children and I would probably be coming back. We  
11 still had some of our pets back in South Carolina,  
12 and our things in South Carolina. I was not -- I  
13 really didn't think we would be staying, long-term.  
14 Q What pets did you take with you?  
15 A In the vehicles with us, we had -- the  
16 girls had two cats in Matt's vehicle; one we still  
17 have that made it through, and one didn't and he's  
18 buried with my daughter; my son had two birds, and  
19 I had a small dog with me.  
20 Q And what kind of dog was it?  
21 A Chiweenie.  
22 Q And as I understand, y'all took two cars.  
23 You rented -- was it a van?  
24 A Yes.  
25 Q And then the Villager?

5 (Pages 14 to 17)

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1 A Yes. That was Matt's car.  
 2 Q And you sat here through Ms. Duncan's  
 3 deposition?  
 4 A Right.  
 5 Q It was Exhibit number 4 to her  
 6 deposition. Y'all had a policy with Allstate --  
 7 not Exhibit 4. Look at Exhibit number 2, excuse  
 8 me, from Ms. Duncan's deposition. Is that the  
 9 policy y'all had with Allstate?  
 10 A Yes.  
 11 Q And the vehicles were the 1995 Mercury  
 12 Villager and the 1965 Ford Mustang?  
 13 A Yes.  
 14 Q So you drove the Villager and then the  
 15 rental vehicle; is that right?  
 16 A Correct. The Mustang was parked at my  
 17 parents' house and was staying there.  
 18 Q After he lost the job with SCANA and  
 19 y'all moved back up here, from October until April,  
 20 did he work anywhere?  
 21 A No, he didn't.  
 22 Q Did you have anything to do with getting  
 23 you added as a driver to your dad's and Ms.  
 24 Duncan's policy? Do you call her your stepmother  
 25 or mother?

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1 A She's my stepmother.  
 2 Q Did you have anything to do with that?  
 3 A How do you mean?  
 4 Q Did you fill out any of the documents?  
 5 Did you assist in providing her the information  
 6 where she went in and made the request?  
 7 A She told me that because I was driving a  
 8 rental vehicle in her name, that she was going to  
 9 add me to their policy; and I agreed because I was  
 10 driving a vehicle rented in her name.  
 11 Q And when did she tell you that?  
 12 A I don't know an exact date, but I am  
 13 fairly sure it was when we discussed her renting  
 14 the vehicle, and me giving her the money since she  
 15 was using her credit card.  
 16 Q So she went and paid for the rental  
 17 vehicle?  
 18 A Yes.  
 19 Q Did you pay for it, at all?  
 20 A I gave her cash.  
 21 Q So you paid her back?  
 22 A Yes.  
 23 Q Do you recall when she told you that she  
 24 was gonna add you as a -- did she tell you she was  
 25 adding you as a driver? What did she tell you?

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1 A Yeah. She said that she was adding me to  
 2 her policy with my father.  
 3 Q And do you know when that was?  
 4 A It was probably, either, the 8th or 9th  
 5 because we would have had this discussion before I  
 6 was able to drive the rental vehicle.  
 7 Q Do you recall where you were when you had  
 8 the discussion?  
 9 A At their home.  
 10 Q Was there any other discussion about it  
 11 other than, hey, I'm gonna add you as a driver to  
 12 the policy?  
 13 A She made sure that my husband wasn't  
 14 going to be driving the vehicle, that it was only  
 15 me that would be driving the vehicle; and I assured  
 16 her, I was the only one that would be driving it.  
 17 Q Did you have anything to do with filling  
 18 out any of the documents we went through?  
 19 And the documents I'm talking about --  
 20 you were here for her deposition and saw the  
 21 documents we went through which have been marked as  
 22 exhibits. Did you have anything to do with  
 23 preparing any of those documents?  
 24 A I did not.  
 25 Q Other than the conversation where she

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1 told you that she was gonna add you as a driver to  
 2 the policy, did y'all have any other discussion  
 3 about it?  
 4 A Not that I recall.  
 5 Q At some point, did she ever tell you that  
 6 she added you as a driver?  
 7 A Yes. She did tell me that I was added to  
 8 their policy.  
 9 Q When did she tell you that?  
 10 A I don't remember the date.  
 11 Q Did you go down with her to get the  
 12 rental car?  
 13 A I did.  
 14 Q Do you remember what date that was?  
 15 A I believe it was the 9th of April.  
 16 Q And it looks like April 9, 2016.  
 17 A Yes.  
 18 Q Did you fill out any of the paperwork --  
 19 and for the record, that was an exhibit in  
 20 Ms. Duncan's deposition, number 5.  
 21 Did you sign any of the paperwork?  
 22 A I don't believe that I did.  
 23 Q And it was just the two of y'all that  
 24 went down there that day?  
 25 A Yes.

6 (Pages 18 to 21)

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1 Q And I believe Ms. Duncan said it was at  
2 the airport. Is that your recollection?  
3 A Yes.  
4 Q Exhibit 2 from Ms. Duncan's deposition --  
5 we talked about the Mercury Villager and the Ford  
6 Mustang. Who owned those cars?  
7 A My husband and I did.  
8 Q Both of y'all were on the title?  
9 A Actually, I believe I was on both titles  
10 and he wasn't.  
11 Q And then the 2005 Explorer and 2009 Lexus  
12 ES350 that are on Wyndolyn and Timothy Duncan's  
13 policy, did you have any ownership in those?  
14 A No.  
15 Q Did you ever drive those?  
16 A Yes.  
17 Q How often did you drive them?  
18 A Occasionally. If I needed to run to the  
19 grocery store or run an errand, and their car was  
20 easier to get out of the driveway, then I was  
21 allowed to take either vehicle and the keys were  
22 always in the kitchen.  
23 Q How often do you think you drove them?  
24 A A few times a week.  
25 Q Which one did you drive -- or I think you

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1 said both of them.  
2 A I used both. Usually it would be the  
3 Explorer more often.  
4 Q So y'all got the rental vehicle, and then  
5 y'all left home what day?  
6 A I believe it was the 12th.  
7 Q So Tuesday; is that correct?  
8 A I believe so.  
9 Q And again, do you have any idea what the  
10 reservation -- or did your husband make a  
11 reservation up there in Montana for the hotel?  
12 A I believe we had a reservation, but I  
13 can't remember where or what date, exactly, we  
14 thought we would make it there.  
15 Q And again, did you look at any apartments  
16 or neighborhoods?  
17 A No.  
18 Q Why is that?  
19 A Again, I didn't think this job was gonna  
20 last, and I wasn't willing to sign a lease, and we  
21 were really unfamiliar with the area. I've never  
22 been to Montana. I had no idea what would be close  
23 to this job, or available, from so far away.  
24 Q When he was living, from October to  
25 April, with y'all at the house, did he apply for

Page 24

1 any jobs at that point?  
2 A Yes. He was constantly applying for jobs  
3 in many states and many areas.  
4 Q So he got this job in Montana. Did he  
5 talk to them on the phone?  
6 A He had a Skype interview, and anything  
7 else was either e-mail or phone.  
8 Q So it was all done through Skype or  
9 e-mails?  
10 A Correct. Or phone.  
11 Q And was it the same e-mail address that  
12 you had? What e-mail address was it?  
13 A It was his personal e-mail address.  
14 Q Mercury Villager -- what kind of vehicle  
15 is that?  
16 A It's a minivan.  
17 Q So both of you had the minivans?  
18 A We owned a minivan, and then the rented  
19 vehicle was a minivan, as well.  
20 Q How long did you think the job would  
21 last? Was there a chance that the job was gonna  
22 last, maybe he wanted it to last?  
23 A I have no way of saying it would last or  
24 not. Again, he had trouble keeping a job.  
25 Q Was there any reason why he had trouble

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1 keeping a job?  
2 A He had a problem with authority; he  
3 didn't work well with others; didn't like being  
4 given direction; probably had some mental issues  
5 that needed medication but refused to get any sort  
6 of treatment for that; so yeah, there were several  
7 reasons the job probably wouldn't have worked out.  
8 MR. MORGAN: Okay. All right. That's  
9 all I've got. Thank you.  
10 MR. BRENDTRO: A couple questions for  
11 you.  
12 EXAMINATION  
13 BY MR. BRENDTRO:  
14 Q Did you say you left some pets behind?  
15 A Yes.  
16 Q Which pets did you leave behind?  
17 A Our dog, Bear -- or one of our dogs.  
18 Q How old was Bear?  
19 A Bear was probably seven years old.  
20 Q What kind of dog was he?  
21 A She's a Great Dane/Saint Bernard.  
22 Q Any other pets that you left behind?  
23 A No. No other pets.  
24 Q Did you leave him with Wendy and Tim?  
25 A I left him with my mother, who also lived

7 (Pages 22 to 25)